

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MEDTECH PRODUCTS INC.,

Plaintiff,

v.

**RANIR, LLC and
CVS PHARMACY, INC.**

Defendant.

MEDTECH PRODUCTS INC.,

Plaintiff,

v.

**DENTEK ORAL CARE, INC.,
KELLY M. KAPLAN,
RAY DUANE, and
C.D.S. ASSOCIATES, INC.,**

Defendants.

MEDTECH PRODUCTS INC.,

Plaintiff,

v.

**POWER PRODUCTS, INC.,
d/b/a/ SPLINTEK,**

Defendant.

07 CV 3302 (KMK) (LMS)

**PLAINTIFF'S MOTION TO FILE ITS
MEMORANDUM OF LAW IN
SUPPORT OF ITS MOTION FOR
PRELIMINARY INJUNCTION AND
DECLARATIONS AND EXHIBITS
THERE TO UNDER SEAL**

Plaintiff Medtech Products Inc. hereby moves this Court pursuant to Fed. R. Civ. P. 26(c) for an order to file under seal the Memorandum of Law in Support of Plaintiff Medtech Products

Inc.'s Motion for Preliminary Injunction ("Memorandum of Law"); the Declaration of Michael Lesser and Exhibits A through F thereto; the Declaration of Charles Schrank and Exhibits A through F thereto; the Declaration of Gerard F. Butler and Exhibit A thereto; the Declaration of Douglas E. Smith on behalf of FTI Consulting and Exhibit 1 thereto; the Declaration of Karen Costa-Strachan and Exhibits A through C thereto; the Declaration of Lieven Nuytens and Exhibit A thereto; and the Declaration of Amy S. Manning, Esq. and Exhibits A through C thereto, which are to be filed in the captioned case on October 19, 2007 (copies of the Memorandum of Law, the declarations and their respective exhibits are attached only to the courtesy copy of the Motion for Preliminary Injunction).

The Memorandum of Law and the declarations and exhibits in support of the Motion for Preliminary Injunction include trade secrets and other confidential and proprietary information, the disclosure of which would place an undue burden on Plaintiff. As such, Plaintiff respectfully requests that the Court grant its motion to file the above identified documents under seal. For the Court's convenience, a proposed order sealing certain documents is being submitted herewith.

Dated: October 19, 2007

Respectfully submitted,

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